

**RESPONSE TO THE MOTION OF
LITTON LOAN SERVICING, LP FOR RELIEF FROM STAY**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Vernon Dewayne Jackson, Debtor, and files this Response to the Motion of Litton Loan Servicing, LP for Relief from Stay and would show this Court as follows:

1. Debtor admits the allegations contained in paragraphs 1 through 3.
2. In response to paragraph 4, Debtor admits the execution of the promissory note but alleges that he does not have any personal liability on said note.
3. Debtor denies the allegations contained in paragraph 5. The asserted lien of Movant is invalid for Movant's failure to comply with the applicable provisions of the Texas Constitution for a home equity loan. Specifically, the loan was not closed at the office of a title company, the lender or an attorney at law as required by the Texas Constitution.
4. Debtor denies the allegations contained in paragraphs 7 through 12.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this court deny the Motion of Litton Loan Servicing, LP for Relief from Stay and award Debtor such other and further relief to which he may show himself justly entitled.

Respectfully submitted,

OLSON NICOUD & GUECK, L.L.P.
1201 Main Street, Suite 2470
Dallas, Texas 75202
(214) 979-7300 - Telephone
(214) 979-7301 - Facsimile
Email: rmnicoud@dallas-law.com

By: /s/ Robert M. Nicoud, Jr.
Robert M. Nicoud, Jr.
State Bar No. 15017900

ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Response to the Motion of Litton Loan Servicing, LP for Relief from Stay was served upon:

Shawn I. Carter
Barrett Burke Wilson
Castle Daffin & Frappier, L.L.P.
1900 St. James Place, Suite 500
Houston, Texas 77056

Office of the United States Trustee
110 N. College Ave, Suite 300
Tyler, Texas 75702

via electronic means or U.S. Regular 1st Class Mail, on the 19th day of November, 2003.

/s/ Robert M. Nicoud, Jr.

Robert M. Nicoud, Jr.